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December 5, 2019

Via ECF and Email

Honorable Robert D. Drain  
United States Bankruptcy Court  
300 Quarropas Street  
White Plains, New York 10601

Re: In re Sears Holdings Corporation, et al., Case No. 18-23538 (rdd)  
Debtor's 10<sup>th</sup> Omnibus Objection to Claims

Dear Judge Drain:

I write on behalf of my clients, Orient Craft Ltd and HK Sino-Thai Trading, and other administrative claimants listed below who have responded to the Debtor's 10<sup>th</sup> Omnibus Objection to Claims and briefed the World Imports issue. We object to the Debtors' unilateral adjournment of the hearing on this matter scheduled for December 13, 2019, and the Debtors unilateral grant to themselves of another month or more to file reply papers.

By way of background on this issue, when we asked the Debtors for an extension of our time to file opposition papers, they only agreed to give us a one-week extension of our time and they did this quite begrudgingly. Now, the Debtors have had an additional five weeks for their reply papers but still have not filed anything. At the beginning of this week, I requested that the Debtors file their reply papers by the end of this week, in preparation for oral argument on December 13<sup>th</sup>. I only heard through third parties that the Debtors intend to adjourn the hearing on this matter to the end of January.

Further delay in the resolution of our clients' respective claims may prejudice our clients because, depending on the Court's decision, appeals may need to be taken for a final resolution of this significant bankruptcy issue. Meanwhile, the Debtors confirmed plan may go effective before all such appeals are decided and, without any reserve for our clients' disputed claims, our clients could suffer irreparable harm.

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Accordingly, we request a chambers conference at Your Honor's earliest convenience.

Respectfully submitted,



David H. Wander

/s/ Todd M. Arnold

Todd M. Arnold

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Coop. Group Co., Ltd.*

/s/ Jeffrey Schwartz

Jeffrey Schwartz

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/s/ Joseph E. Sarachek

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/s/ Edward L. Schnitzer

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Attorneys for *BST International Fashion Ltd*

cc: Garrett Fail, Esq.